

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ICBC (LONDON) PLC,

Plaintiff,

v.

15 Civ. 0070 (LAK) (FM)

THE BLACKSANDS PACIFIC GROUP, INC.,

Defendant.

THE BLACKSANDS PACIFIC GROUP, INC. and  
BLACKSANDS PACIFIC ALPHA BLUE, LLC,

Counter-Plaintiffs,

v.

ICBC (LONDON) PLC,

Counter-Defendant.

**DISCLOSURE STATEMENT PURSUANT TO FED. R. CIV. P. 7.1**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Plaintiff ICBC (London) plc ("ICBC") makes the following disclosures:

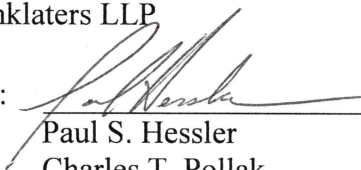
Plaintiff ICBC is a wholly-owned subsidiary of the Industrial and Commercial Bank of China Limited, a publicly held corporation.

Dated: New York, New York  
February 12, 2015

Respectfully submitted,

Linklaters LLP

By:

  
Paul S. Hessler

Charles T. Pollak

1345 Avenue of the Americas

New York, NY 10105

(212) 903-9000

(212) 903-9100 (fax)

*Attorneys for ICBC (London) plc*